

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BIS ADVANCED SOFTWARE SYSTEMS,
LTD.,

Plaintiff,

v.

RED BEND SOFTWARE, INC.,
RED BEND, LTD.,
TIME WARNER INC.,
ICQ, INC.
INSTALLSHIELD SOFTWARE CORP.,
and
SCANSOFT, INC.

Defendants.

Civil Action No. 04cv11960 (RWZ)

NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)

**TO: Neil Greenblum, Esq.
Caitlin Lhommedieu, Esq.
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191-1411**

Attorneys for Plaintiff BIS Advanced Software Systems, Ltd.

**John Allcock
Andrew P. Valentine
Timothy Lohse
DLA Piper Rudnick Gray Cary LLP
2000 University Avenue
East Palo Alto, CA 94303-2248**


Attorneys for Defendant Scansoft, Inc.

PLEASE TAKE NOTICE that Defendants Red Bend Software, Inc., Red Bend, Ltd, and ICQ, Inc. will take the deposition of Plaintiff BIS Advanced Software Systems, Ltd., by one or more of its officers, directors, managing agents, employees or other persons whom BIS shall

designate pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure as having the most knowledge concerning the matters set forth in Schedule A, attached hereto.

The deposition will commence on Monday, July 25, 2005. The deposition will be stenographically recorded and may be videotaped. The deposition will take place at the offices of the Eitan Law Group, 2 Gav Yam Center, 7 Shenkar Street, Herzlia, Israel 46725.

You are invited to attend and cross-examine.


Miguel C. Danielson (BBO # 651288)
GOODWIN PROCTER LLP
53 State Street
Boston, MA 02109
Tel: 617-570-1000
Fax: 617-523-1231

Ethan Horwitz (*pro hac vice*)
Anastasia Fernands (BBO# 633131)
GOODWIN PROCTER LLP
599 Lexington Avenue
New York, New York 10022
Tel: 212-813-8800
Fax: 212-353-3555

**ATTORNEYS FOR RED BEND SOFTWARE,
INC., RED BEND, LTD., TIME WARNER
INC., ICQ, INC. and INSTALLSHIELD
SOFTWARE CORP.**

Dated: June 27, 2005

SCHEDULE A

Definitions

A. The terms "BIS," "you" or "your" mean BIS Advanced Software Systems, Ltd., its officers, directors, employees, servants, agents, subsidiaries, licensees, and all persons acting or purporting to act on their behalf;

B. The uniform definitions set forth in Rule 26.5 of the Local Rules of the United States District Court for the District of Massachusetts are incorporated herein by reference.

Topics for Examination

1. Any document retention policy, whether formal or informal, at BIS from January 1, 1998 to the present.

2. BIS's procedures and practices for document retention.

3. BIS's electronic document storage including, but not limited to, any network storage, archiving, or backup magnetic media storage.

4. BIS's document filing systems.

5. BIS's e-mail systems, including any policies concerning destruction and/or retention of e-mail.

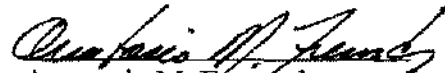
6. BIS's policies and/or procedures for documentation of inventions, including, but not limited to, invention disclosures.

7. The name and title of any person responsible for document retention policies, procedures or practices since 1999.

8. BIS's search for and gathering of documents in response to Defendants' First Request for Production of Documents and Things.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6) was served upon counsel for Plaintiff BIS Advanced Software Systems, Ltd. and counsel for Defendant Scansoft, Inc. by e-mail and United States Mail on June 27, 2005.


Anastasia M. Fernands

Dated: June 27, 2005